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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 8

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Ref: 8EPR-ER

February 13, 2007

MEMORANDUM

SUBJECT: Superfund Removal Action at Vermiculite Intermountain Site
Requirement for Experienced Libby Amphibole ERRS Personnel

FROM: Joyce M. Ackerman
On-Scene Coordinator

A handwritten signature in black ink, appearing to read "Joyce Ackerman", is written over the name and title of the sender.

TO: Lisa Walker
Contracting Officer

EPA will soon be issuing a delivery order to the ERRS contractor to perform an asbestos cleanup at the Vermiculite Intermountain Site in Salt Lake City, Utah. This will consist of an outdoor excavation of soils containing Libby Amphibole (LA) asbestos fibers.

This Site is one of the "Libby Sisters," a reference to processing plants which received vermiculite from a mine in Libby, Montana. Vermiculite from this mine is heavily contaminated with amphibole asbestos, and many sites in Libby and at processing plants across the county are undergoing EPA cleanups. The Libby amphibole type of asbestos is believed to be more toxic than the more common chrysotile asbestos used in floor tiles and many insulation products.

Based on my experience with cleanups at the Libby Sister sites, I have found that there is a considerable learning curve for cleanup personnel at these sites. Personnel must learn that there is zero tolerance for generating dust during cleanup activities, and that decontamination procedures must take into account the smallest detail to ensure removal of asbestos fibers. I have found that asbestos contractors trained in chrysotile cleanups do not necessarily understand how to perform these types of cleanups to EPA requirements and have little to no experience with outdoor asbestos excavations.

The Vermiculite Intermountain Site is in downtown Salt Lake City and the exclusion zone must be contained within the Site itself. Streets and sidewalks may not be closed during the removal action. There may be a considerable amount of traffic and pedestrians near the Site. For this reason, dust control and decontamination of vehicles leaving the Site are especially important to avoid exposing the public to asbestos fibers.

For this reason, I am requiring that all key ERRS personnel assigned to this Site have experience with Libby amphibole cleanups. This would include the Response Manager, foreman, all operators, and the majority of the laborers. This may necessitate mobilizing

personnel to the Site from offices other than Salt Lake City. I believe the costs for any additional mobilizations are justified for health and safety reasons, and also to expedite the work and avoid unnecessary training for personnel new to Libby amphibole cleanups. It will also mitigate personnel inadvertently spreading asbestos fibers into uncontaminated areas due to a lack of training.

Thank you for your assistance in this matter. If you have any questions, please contact me at x6822.

cc: Mike Zimmerman